

CO-ORDERED

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Mar 31, 2020

In re:

FORESIGHT ENERGY, LP, *et al.*¹
Debtors.

Chapter 11

Case No. 20-41308-659
(Jointly Administered)

Kathy A. Surratt - States
KATHY A. SURRETT-STATES
Chief United States Bankruptcy Judge

VERIFIED MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, I, Kurt F. Gwynne, move to be admitted *pro hac vice* to the bar of this Court for the purpose of representing Wilmington Trust, National Association, as indenture trustee for the 11.50% Senior Secured Notes due 2023, in the instant matter. In support of this motion, I submit the following information as required by Local Rule 12.01(F):

a. *Full name of movant-attorney:*
Kurt F. Gwynne

b. *Address and telephone number of movant-attorney:*
Reed Smith LLP
1201 N. Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 778-7500

RECEIVED+FILED
2020 MAR 30 AM 11:00
CLERK'S OFFICE, U.S. DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS, MISSOURI 63101

¹ The Debtors in these cases are each incorporated or organized in the state of Delaware, and along with the last four digits of each Debtor's federal tax identification number (or SEC filing number if unavailable), are: Foresight Energy LP (8894); Foresight Energy GP LLC (8332); Foresight Energy LLC (7685); Foresight Energy Employee Services Corporation (7023); Foresight Energy Services LLC (6204); Foresight Receivables LLC (2250); Sugar Camp Energy, LLC (8049); Macoupin Energy LLC (9005); Williamson Energy, LLC (9143); Foresight Coal Sales LLC (8620); Tanner Energy LLC (0409); Sitran LLC (9962); Seneca Rebuild LLC (0958); Oeneus LLC (6007); Adena Resources, LLC (4649); Hillsboro Transport LLC (6881); American Century Transport LLC (SEC No. 5786); Akin Energy LLC (1648); American Century Mineral LLC (SEC No. 5788); Foresight Energy Finance Corporation (5321); Foresight Energy Labor LLC (4176); Viking Mining LLC (4981); M-Class Mining, LLC (5272); MaRyan Mining LLC (7085); Mach Mining, LLC (4826); Logan Mining LLC (2361); LD Labor Company LLC (8454); Coal Field Repair Services LLC (9179); Coal Field Construction Company LLC (5694); Hillsboro Energy LLC (1639); and Patton Mining LLC (7251). The address of the Debtors' corporate headquarters is One Metropolitan Square, 211 North Broadway, Suite 2600, St. Louis, Missouri 63102.

c. *Name of the firm or letterhead under which the movant practices*
Reed Smith LLP

d. *Name of the law schools(s) movant attended and the date(s) of graduation therefrom:*
University of Pennsylvania Law School - 1992

e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any:*
US Supreme Court - 2014
US District Court, Delaware - 2001
US District Court, New Jersey - 1994
US District, Eastern District New York - 2018
US District, Southern District of New York - 2018
US District Court, Eastern District of Michigan - 2000
US District Court, Central District of Illinois - 1999
US District Court, Northern District of Texas - 1997
US District Court, Eastern District of Pennsylvania - 1995
US District Court, Middle District of Pennsylvania - 1995
US District Court, Western District of Pennsylvania - 1995
Third Circuit Court of Appeals - 1998

Pennsylvania (No. 66390) - 1992
New Jersey (No. 023521992) - 1992
Delaware (No. 3951) - 2000
New York (No. 5605206) - 2018

f. *Statement that attorney seeking admission is a member in good standing of all bars of which attorney is a member and that attorney is not under suspension or disbarment from any bar:*
Movant affirms that he is a member in good standing of all bars of which movant is a member and movant is not under suspension or disbarment from any bar.

g. *Statement that attorney seeking admission does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District:*
Movant affirms that he does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: March 27, 2020

REED SMITH LLP



Kurt F. Gwynne

*Attorneys for Wilmington Trust, National
Association, as indenture trustee for the 11.50%
Senior Secured Notes due 2023, as amended*

ReedSmith

Driving progress
through partnership

John B. Lord, Bankruptcy Paralegal
Direct Phone: 302.778.7577
Email: jlord@reedsmit.com

1201 Market Street
Suite 1500
Wilmington, DE 19801-1163
302.778.7500
Fax 302.778.7575

March 27 2020

VIA OVERNIGHT MAIL

Clerk of the Court
United States Bankruptcy Court for the
Eastern District of Missouri
Thomas F. Eagleton U.S. Courthouse
111 S. 10th Street, 4th Floor
St. Louis, MO 63102

Re: *In re: Foresight Energy LP, Case No. 20-41308-659*
U.S. Bankruptcy Court for the Eastern Dist. of Missouri

CLERK, EASTERN DISTRICT OF
ST. LOUIS, MISSOURI

2020 MAR 30 AM 10:59

RECEIVED + FILED

Clerk of the Court:

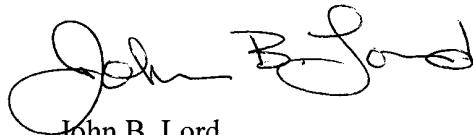
This firm is counsel to Wilmington Trust, National Association, as indenture trustee for the 11.50% Senior Secured Notes due 2023 in the above-referenced matter. Enclosed please find two (2) verified motions for admission *pro hac vice* for Kurt F. Gwynne, Esq. and Jason D. Angelo, Esq. (both of Reed Smith LLP in Wilmington, DE), as well as two (2) checks payable to "Clerk, U.S. District Court" for \$100.00/each. Due to the COVID-19 virus outbreak and Delaware's mandatory work restrictions, we have only provided electronically-signed versions of the motions for admission *pro hac vice* in lieu of original, physically signed versions.

We appreciate your attention to this matter. Also note, once the Court receives the motions for admission *pro hac vice* and payments thereto, Messrs. Gwynne and Angelo will be registering for CM/ECF filing privileges as *pro hac vice* counsel in the above-referenced matter.

Please contact Jason D. Angelo, Esq. at jangelo@reedsmit.com or me at jlord@reedsmit.com at the Court's convenience if the Court has further questions or requires additional information. Thank you.

Respectfully submitted,

REED SMITH LLP



John B. Lord
Bankruptcy Paralegal

/jbl
Enclosures

Certificate of Notice Pg.5 of 7
United States Bankruptcy Court
Eastern District of MissouriIn re:
Foresight Energy LP
DebtorCase No. 20-41308-kss
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0865-4

User: admin
Form ID: pdfolPage 1 of 3
Total Noticed: 1

Date Rcvd: Mar 31, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 02, 2020.

aty +Kurt F. Gwynne, Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, DE 19801-1163

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Apr 02, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 31, 2020 at the address(es) listed below:

Alice Belisle Eaton on behalf of Debtor Foresight Energy LP
 aeaton@paulweiss.com;mcolarossi@paulweiss.com;pbasta@paulweiss.com;slascano@paulweiss.com;awoolve
 rton@paulweiss.com;orahnama@paulweiss.com;mtattnall@paulweiss.com;psteel@paulweiss.com;dweiss@pau
 lweiss.com

Amy A. Zuccarello on behalf of Creditor Lord Securities Corporation azuccarello@sandw.com,
 azuccarello@sullivanlaw.com

Brad M. Kahn on behalf of Creditor Ad Hoc First Lien Group bkahn@akingump.com

Brian C. Walsh on behalf of Creditor Davidson Kempner Capital Management LP
 brian.walsh@bclplaw.com

Christopher Foy on behalf of Creditor Illinois Department of Natural Resources
 cfoy@atg.state.il.us

Christopher J. Lawhorn on behalf of Creditor Javelin Global Commodities UK Ltd
 cjl@carmodymacdonald.com, txs@carmodymacdonald.com;aep@carmodymacdonald.com

Cullen Drescher Speckhart on behalf of Creditor Committee John Fabick Tractor Company/Fabick
 Mining, Inc. cspeckhart@cooley.com, efiling-notice@ecf.pacerpro.com

Dominique Sinesi on behalf of Interested Party United States of America
 dominique.sinesi@usdoj.gov

Erika L. Todd on behalf of Creditor Lord Securities Corporation etodd@sandw.com,
 etodd@sullivanlaw.com

Ira S Dizengoff on behalf of Creditor Ad Hoc First Lien Group idizengoff@akingump.com

Jaimie L Mansfield on behalf of Debtor Sugar Camp Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com

Jaimie L Mansfield on behalf of Debtor Macoupin Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com

Jaimie L Mansfield on behalf of Debtor Tanner Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com

Jaimie L Mansfield on behalf of Debtor Williamson Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com

Jaimie L Mansfield on behalf of Debtor Foresight Coal Sales LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com

James Savin on behalf of Creditor Ad Hoc First Lien Group jsavin@akingump.com

Jennifer M McLemore on behalf of Creditor Natural Resource Partners L.P., et al.
 jmlempore@williamsmullen.com

Joel A Kunin on behalf of Creditor Cory Leitschuh jkunin@ghalaw.com, megan@ghalaw.com

Joel A Kunin on behalf of Creditor Terra Payne, as Special Administrator of the Estate of
 William Daniel Hans Payne jkunin@ghalaw.com, megan@ghalaw.com

John G. Willard on behalf of Debtor Foresight Energy Labor LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com

John G. Willard on behalf of Debtor Foresight Energy Finance Corporation
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com

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User: admin
Form ID: pdfol

Page 2 of 3
Total Noticed: 1

Date Rcvd: Mar 31, 2020

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

John G. Willard on behalf of Debtor MaRyan Mining LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Akin Energy LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Adena Resources, LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Hillsboro Transport LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Foresight Energy LP jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Oeneus LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Mach Mining, LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Sitran, LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Seneca Rebuild LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor American Century Transport LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor American Century Mineral LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John T.M. Whiteman on behalf of Creditor Missouri Department of Revenue edmoecf@dor.mo.gov
John Talbot Sant, Jr. on behalf of Creditor Committee Official Committee of Unsecured Creditors tsant@affinitylawgrp.com, kschimweg@affinitylawgrp.com
Kathryn Redmond on behalf of Debtor Coal Field Repair Services LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Logan Mining LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor LD Labor Company LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Coal Field Construction Company LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Foresight Energy LP kredmond@atllp.com, bvogt@atllp.com
Mark V. Bossi on behalf of Creditor Ad Hoc First Lien Group mbossi@thompsoncoburn.com, lmckinnon@thompsoncoburn.com
Marshall C. Turner on behalf of Creditor Lord Securities Corporation marshall.turner@huschblackwell.com, gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com
Marshall C. Turner on behalf of Creditor Huntington National Bank marshall.turner@huschblackwell.com, gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com
Michael D Mueller on behalf of Creditor Natural Resource Partners L.P., et al. mmueller@williamsmullen.com
Nathaniel R.B. Koslof on behalf of Creditor Lord Securities Corporation nkoslof@sullivanlaw.com
Office of US Trustee USTPRegion13.SL.ECF@USDOJ.gov
Patrick Cloud on behalf of Creditor Mt. Olive and Staunton Coal Company Trust pcloud@heyroyster.com
Richard J. Parks on behalf of Creditor Joy Global Conveyors Inc. rjp@pietragallo.com
Richard J. Parks on behalf of Creditor Joy Underground Mining LLC rjp@pietragallo.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor M-Class Mining, LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Hillsboro Energy LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Patton Mining LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy GP LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy Services LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy Employee Services Corporation rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LP rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Receivables LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Viking Mining LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Robert E. Eggmann on behalf of Creditor Mangrove Partners ree@carmodymacdonald.com, thr@carmodymacdonald.com;ala@carmodymacdonald.com;syd@carmodymacdonald.com
Rusty Keith Reinoehl on behalf of Creditor Bradford Supply Company rusty@rklegalgroup.com, rusty@rklegalgroup.com;riley@rklegalgroup.com
Spencer P. Desai on behalf of Creditor Mangrove Partners spd@carmodymacdonald.com, ala@carmodymacdonald.com;txs@carmodymacdonald.com
Steven M. Wallace on behalf of Creditor John Milo Kee steve@silverlakelaw.com, denise@silverlakelaw.com

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Form ID: pdfol

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Total Noticed: 1

Date Rcvd: Mar 31, 2020

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Steven M. Wallace on behalf of Creditor Robin Lynne Kee Williams steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor Mitchell/Roberts Partnership, an Illinois Partnership steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor Carol Dean Crabtree steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor J. Earl Baldwin, Personal Representative of the Estate of Katherine Baldwin, Deceased steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor J. Earl Baldwin, Personal Representative of the Estate of Beverly B. Adams, Deceased steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor Carl Inman, Executor of the Estate of Russell J. Inman, Deceased steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor Reba Mitchell, Individually and as Trustee and Beneficiary of the Robert H. Mitchell Residual Trust steve@silverlakelaw.com, denise@silverlakelaw.com
Steven M. Wallace on behalf of Creditor David Senseney, Executor of the Estate of Marguerite Boos, Deceased steve@silverlakelaw.com, denise@silverlakelaw.com
Thomas H Riske on behalf of Creditor Javelin Global Commodities UK Ltd thr@carmodymacdonald.com, syd@carmodymacdonald.com;ala@carmodymacdonald.com
Thomas H Riske on behalf of Creditor Javelin Global Commodities (UK) Ltd thr@carmodymacdonald.com, syd@carmodymacdonald.com;ala@carmodymacdonald.com
Timothy P. Palmer on behalf of Creditor Huntington National Bank Timothy.Palmer@BIPC.com
Wendi S. Alper-Pressman on behalf of Creditor Natural Resource Partners L.P., et al. wpressman@lathropgage.com, jbuchheit@lathropgage.com, stlfilings@lathropgage.com
Zachary Dain Lanier on behalf of Creditor Ad Hoc First Lien Group zlanier@akingump.com
TOTAL: 75